

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION**

UNITED STATES OF AMERICA

v.

Case No: 7:19mj51

ROBERT KOVACIC

UNOPPOSED MOTION TO CONTINUE BOND HEARING

Comes now the Defendant, Robert Kovacic, by counsel, and requests that this Court grant a brief continuance of his bond hearing, currently set for Monday, June 3, at 2 pm, in support whereof, counsel states as follows:

1. Mr. Kovacic was arrested on May 16, 2019 in Roanoke, Virginia under 18 U.S.C. § 3184 as a fugitive from Bosnia and Herzegovina, based on an arrest warrant issued there on June 6, 2014, charging him with a war crime against a civilian.
2. He had his initial appearance in this Court on May 17, 2019, and a bond hearing was set for June 3, 2019 at 2 pm in this court. Because his prior counsel at the Federal Defender's Office will be unavailable in the coming weeks, the undersigned noted her appearance as his attorney on May 21, 2019.
3. Because of the unique nature of extradition proceedings, the age of the alleged events in the complaint, which date to 1995, and the need to obtain further information regarding Mr. Kovacic's medical history, counsel requires additional time to obtain evidence related to the special circumstances justifying the grant of bond in this case. *See Wright v. Henkel*, 190 U.S. 40, 63 (1903) (noting the court's inherent authority to grant bail in cases of foreign extradition where special circumstances justifying bail exist).

4. Counsel has communicated with Assistant United States Attorney Anthony Giorno, the government has no opposition to a continuance.

Wherefore, Mr. Kovacic, by counsel, requests that the Court grant a continuance of his bond hearing set for June 3, 2019.

Respectfully submitted,

ROBERT KOVACIC

By Counsel

s/ Erin Trodden
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CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: counsel of record; and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants: none.

s/ Erin Trodden _____